

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In re:
William T. Reitz : Case No. 21-70243-JAD
Debtor(s) : Chapter 13

William R. Reitz :
Movant(s) : Related to Document #27
vs. :

Clearfield County Tax Claim Bureau : Hearing Date: 8/18/21 at 10:00 a.m.
Respondent(s) :
And :
Ronda J. Winnecour, Esquire :
Chapter 13 Trustee :
Respondent(s) :

CHAPTER 13 TRUSTEE'S RESPONSE TO MOTION TO SELL REAL PROPERTY FREE AND CLEAR OF ALL LIENS AND ENCUMBRANCE

RONDA J. WINNECOUR, Chapter 13 Trustee, responds as follows:

1. The Motion seeks approval of the sale of a piece of vacant land located at Hickory Lane, Lanse, PA 16849 ("Property"), for the price of \$10,000.00. Though the price equals the scheduled value, there is no indication of how the scheduled value was determined, or a basis in the motion to conclude the value is fair market. It does not appear that the Property was marketed.

2. Though the motion indicates that the lot is wooded vacant with no structures, it includes no further details including lot size, or the lot's highest and best use. Based on the nominal liens, as pled, there is clearly a benefit to the unsecured creditors in selling the Property, provided the sale price reflects fair market value.

3. Trustee files this response to raise the issue of the adequacy of the sale price. Trustee requests a showing that objectively establishes that the sale price is a fair reflection of what the Property is worth.

WHEREFORE, the Trustee requests that absent a showing that the sale price is a fair reflection of what the Property is worth or that the sale is otherwise in the best interests of the Estate, that the sale be denied.

RONDA J. WINNECOUR,
CHAPTER 13 TRUSTEE

Date: July 29, 2021

By: /s/ Owen W. Katz
Owen W. Katz, PA I.D. 36473
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CERTIFICATE OF SERVICE

I hereby certify that on the 29th of July 2021, I served one true and correct copy of the foregoing document on the following parties in interest by United States first-class mail, postage prepaid, addressed as follows:

Joseph S. Sisca, Esquire
Assistant U.S. Trustee
Suite 970, Liberty Center
1001 Liberty Avenue
Pittsburgh PA. 15222

All parties on the attached Mailing

/s/Rosa M. Richard
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